

**COMMONWEALTH OF MASSACHUSETTS
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

C.A.# 05-10930-NMG

CAROL STASZEWSKI
Plaintiff

v.

WELLESLEY COLLEGE
Defendant

**JOINT MOTION TO EXTEND PRETRIAL DISCOVERY SCHEDULE BY SIXTY
DAYS**

The parties to this action, through counsel, hereby respectfully request that the Court extend the pretrial discovery schedule in this case by sixty days.

Specifically, it is requested that the pretrial discovery schedule be extended as follows:

1. Fact depositions to be completed and Rule 36 Requests for Admissions to be served by November 30, 2006.
2. Plaintiff to designate expert witnesses by November 30, 2006.
3. Defendant to designate expert witnesses by December 29, 2006.
4. Expert depositions to be completed by January 30, 2007.
5. Dispositive motions to be served by March 16, 2007.
6. Oppositions to dispositive motions to be served within thirty days of service of dispositive motions.

As grounds for this motion, the parties state that they are currently involved in discovery in this action, but that additional time is needed to finish depositions. Paper discovery has been served and responded to, but not all depositions have been completed.

Carol Staszewski
By her attorney

/s/Mitchell J. Notis

Mitchell J. Notis
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, MA 02445
617-566-2700
BBO# 374360

Wellesley College
By its attorneys,

HOLLAND & KNIGHT, LLP

/s/Miriam J. McKendall

Miriam J. McKendall, P.C.
10 St. James Avenue
Boston, MA 02116
617-523-2700
BBO#548825

CERTIFICATE OF SERVICE

I, Mitchell J. Notis, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to any non-registered participants as indicated in the Notice of Electronic Filing, this 28th day of September, 2006.

/s/Mitchell J. Notis

MITCHELL J. NOTIS, BBO# 374360
Law Office of Mitchell J. Notis
370 Washington Street
Brookline, MA 02445
Tel: 617-566-2700

